

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NEW YORK**

BLACK LOVE RESISTS IN THE RUST, *et al.*,  
individually and on behalf of a class of all others  
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**NOTICE OF MOTION TO PERMIT SUFFICIENT TIME TO DEPOSE  
NAMED DEFENDANT BYRON LOCKWOOD**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law and Declaration, Plaintiffs, by their undersigned attorneys, will move the Court at the United States Courthouse for the Western District of New York, 2 Niagara Square, Buffalo, NY 14202, at a date and time to be determined by the Court, for an Order granting leave for sufficient time to depose Named Defendant Byron Lockwood pursuant to Federal Rule of Civil Procedure 30(d)(1).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Rule of Civil Procedure 7(a)(1), Plaintiffs hereby state that they intend to file and serve reply papers. Pursuant to Local Rule of Civil Procedure 7(b)(2)(B), if the Court does not set deadlines by order, any opposition will be due within fourteen days of service of this Motion, and any reply papers will be due within seven days of service of the opposition papers.

Dated: June 1 2023

Respectfully Submitted,

/s/ Claudia Wilner

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 1, 2023, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Claudia Wilner